

## REMARKS

### Amendments to the Claims

Upon entry of the present amendments, claims 1-9 are pending.

Claim 1 is amended to add a block head and a block and to specify that the block and blocking pin are configured to be interchangeably coupled to the block head. Claim 1 is further amended to specify that the seat stage has a surface configured such that the work-piece holder can be repositioned on the seat stage as the work-piece is engaged by the blocking pin. Support for these amendments are found in paragraph 0016 on page 4; in paragraphs 0039, 0040, and 0041 on pages 7-8; in paragraph 0047 on page 10; and in paragraphs 0064 and 0065 on page 16.

Claim 2 is amended to specify that the work-piece holder is configured to automatically self-align on the seat stage as the work-piece holder is engaged by the blocking pin. Support for this amendment is found, *e.g.*, in paragraphs 0016, 0040, 0041, 0047, 0064, and 0065, and in FIGS. 7 and 8.

Claim 4 is amended to correct a self-evident grammatical error.

Claims 6 and 7 are amended to replace "in" with "along." The basis for this alteration in terminology is self-evident and does not change the scope of the claims.

Claim 6 is also amended to specify that the block is so moveable "along a vertical axis when the block is coupled to the block head." Support for this amendment is found in paragraph 0039 on page 7 and in paragraphs 0057 and 0058 on page 13.

Claim 6 is further amended to drop the reference to the blocking apparatus in identifying the vertical axis, while claim 7 is further amended to more plainly specify that the work-piece is moveable along a horizontal plane without reference to the blocking apparatus; support for these amendments are self-evident. There inherently is no need to define the vertical axis and horizontal plane as being relative to the blocking apparatus (*i.e.*, the earth's horizon or gravity are widely understood to serve as references for defining "vertical" and "horizontal" axes/planes), and these terms are used, *e.g.*, in paragraphs 0058 and 0064 in accordance with these understood meanings.

Accordingly, the present amendments do not introduce new matter.

Each of the grounds for rejection cited in the Office Action is addressed below, under an appropriate sub-heading.

### 35 U.S.C. §112, Second Paragraph

Claims 6 and 7 were rejected as being indefinite under 35 U.S.C. §112, second paragraph.

First, the United States Patent and Trademark Office noted that the reference to "said block" in claim 6 lacks antecedent basis. Claim 1 has been amended to introduce a reference to the "block" therein. Accordingly, this reference to a block in claim 1 provides an antecedent basis for the later reference to "said block" in claim 6, thereby remedying this ground for rejection.

Second, the United States Patent and Trademark Office indicated that the text, "in an axis," in claims 6 and 7 should be changed to "along an axis." Claims 6 and 7 are amended accordingly (with an additional substitution of "plane" for "axis" in claim 7). The United States Patent and Trademark Office also indicated that it was unclear how the block and holder are moveable relative to the blocking apparatus. Upon review, it appears that this reference to the blocking apparatus was unnecessary. Accordingly, claims 6 and 7 are amended to remove the phrase "to said blocking apparatus." With these deletions, this objection is remedied.

### 35 U.S.C. §102: Novelty

Claims 1, 2 and 5-9 were rejected as being anticipated under 35 U.S.C. §102(b) by US 5,080,482 (Benz *et al.*). Claim 1, amended herein, is independent, while the remainder of the claims are dependent therefrom and therefore incorporate the limitations of amended claim 1.

As amended, claim 1 specifies that the apparatus includes, *inter alia*, a block head, a block, and a blocking pin, wherein each of the block head, the block and blocking pin is configured such that the block and blocking pin can be interchangeably coupled to the block head. Accordingly, the blocking pin can be inserted into the block for an alignment process (as described in paragraph 0041). After alignment, the block can be substituted for the blocking pin, and blocking can be carried out (as described, *e.g.*, in paragraphs 0004 and 0009).

Benz *et al.* discloses a block (3); however, Benz *et al.* does not disclose a distinct blocking pin for alignment. Instead, Benz *et al.* utilizes a camera (2 in FIG. 2) to generate a visual image for alignment. Because Benz *et al.* uses a camera instead of a blocking pin to align the block, Benz *et al.* does not anticipate the amended claims. Moreover, use of the blocking pin

APPLICANTS: K. Bergandy and W. Bergandy  
U.S.S.N.: 10/676,124

in accordance with this invention eliminates the need for optics and much of the computer control and, therefore, offers simpler and less costly means for alignment when compared with the apparatus of Benz *et al.*

Absent a disclosure of the interchangeable blocking pin (in addition to the block) in Benz *et al.*, Applicants respectfully submit that claim 1, as amended, is novel and accordingly request that this ground for rejection accordingly be reconsidered and withdrawn.

### **35 U.S.C. §103: Non-Obviousness**

Claim 3 was rejected as being obvious under 35 U.S.C. §103(a) in view of Benz *et al.*, while claim 4 was rejected as being obvious under 35 U.S.C. §103(a) in view of Benz *et al.* in view of US 6,045,438 (Shay).

Claims 3 and 4 depend from claim 1 and, therefore, incorporate its limitations. As discussed, above, claim 1, as amended, specifies that the apparatus includes, *inter alia*, a block head, a block, and a blocking pin, wherein each of the block head, the block and blocking pin is configured such that the block and blocking pin can be interchangeably coupled to the block head. Nothing in Benz *et al.* or in Shay suggest this distinctly different approach to alignment, wherein the blocking pin is utilized as described. Consequently, nothing in the prior art suggests the inclusion of an interchangeable block and blocking pin for coupling to a blocking head in a blocking apparatus, as described in claim 1.

Accordingly, Applicants respectfully submit that each of the pending claims is non-obvious over Benz *et al.* and Shay and request that this ground for rejection be reconsidered and withdrawn in view of the amendments to claim 1.

